

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JOB CREATORS NETWORK,	)	
	)	
Plaintiff,	)	
	)	Case No. 1:21-CV-4818-VEC
v.	)	
	)	
OFFICE OF THE COMMISSIONER OF	)	
BASEBALL d/b/a MAJOR LEAGUE	)	
BASEBALL, et al.,	)	
	)	
Defendants.	)	
	)	

**MEMORANDUM OF LAW IN SUPPORT OF MOTION FOR LEAVE TO FILE  
BRIEF AS *AMICI CURIAE* IN SUPPORT OF PLAINTIFF**

This Court has no rules governing *amicus* filings. That being so, Proposed *Amici Curiae* Edwin Meese III and the American Constitutional Rights Union set forth the following that would satisfy Supreme Court Rule 37(1) and Federal Rule of Appellate Procedure 29(b), which *amici* respectfully suggest makes the proffered brief appropriate for filing in this Court.

First, proposed *amici* have sufficient interest in this case. Edwin Meese III served as the 75th Attorney General of the United States. Attorney General Meese has been at the forefront of protecting and defending the Constitution of the United States for decades, including being heavily engaged in election integrity at both the federal and state levels. The American Constitutional Rights Union (ACRU) is a nonpartisan 501(c)(3) nonprofit organization incorporated in Washington, D.C., dedicated to protecting constitutional liberty. The ACRU Policy Board sets the policy priorities of the organization, and includes some of the most distinguished statesmen in the Nation on election matters. Current members of the Policy Board include Attorney General Meese

and former Ohio Secretary of State J. Kenneth Blackwell, who also served as a Commissioner on the Presidential Advisory Commission on Election Integrity and as U.S. Ambassador to the United Nations Human Rights Commission.

Second, the brief is desirable because it provides material that is not duplicative of arguments presented by Plaintiff. Additionally, the credentials and experience of amici in the field of election integrity provides a valuable perspective to assist the Court.

Third, the brief is relevant because the arguments set forth in the attached brief contain various authorities that are directly on-point to the underlying controversy that gave rise to the instant lawsuit and that are not discussed in Plaintiff's filings. Specifically, the attached brief explains why the Georgia statute at issue in this case is fully consistent with voting rights as those rights are enshrined in the Constitution. The brief thus explains why Defendants' actions were predicated on a profoundly erroneous evaluation of the Georgia statute. The brief also explains Defendants' obligations as a for-profit business, how Defendants' actions giving rise to this lawsuit are not consistent with those obligations, and thus why those actions were unjustified. Indeed, the brief also explains how Defendants' decision to move the All-Star Game is inflicting harm on the very community that Defendants claim to be supporting.

Time is of the essence in this case, and this Court will benefit from the above-referenced material to supplement the arguments presented by Plaintiff in reaching its decision in this case on an expedited schedule.

## CONCLUSION

For the foregoing reasons, *amici curiae* respectfully ask this Court for leave to file the attached brief.

Respectfully Submitted,

KRISTINA S. HEUSER, P.C.

By: /S/  
Kristina S. Heuser, Esq. (KH3612)  
Post Office Box 672  
Locust Valley, New York 11560  
Tel. (516) 676-1565  
E-mail: kheuser@heuserlawfirm.com

July 7, 2021

CERTIFICATE OF SERVICE

I hereby certify that on the 7th day of June 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which I understand to have caused service on all counsel of record.

KRISTINA S. HEUSER, P.C.

By: /S/  
Kristina S. Heuser, Esq. (KH3612)  
Post Office Box 672  
Locust Valley, New York 11560  
Tel. (516) 676-1565  
E-mail: [kheuser@heuserlawfirm.com](mailto:kheuser@heuserlawfirm.com)